

# Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

## FHWA-Indiana Environmental Document CATEGORICAL EXCLUSION / ENVIRONMENTAL ASSESSMENT FORM GENERAL PROJECT INFORMATION

|                                     |   |
|-------------------------------------|---|
| <b>Road No./County:</b>             | <b>I-469/US 24/Allen</b>  |
| <b>Designation Number:</b>          | <b>1383675</b>  |
| <b>Project Description/Termini:</b> | <b>I-469 and US 24 Interchange Modification/2,300 feet N and S of US 24 on I-469 and 3,000 east and west of I-469 on US 24/Rose Ave</b> |

After completing this form, I conclude that this project qualifies for the following type of Categorical Exclusion (FHWA must review/approve if Level 4 CE):

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>Categorical Exclusion, Level 2</b> – The proposed action meets the criteria for Categorical Exclusion Manual Level 2 - table 1, CE Level Thresholds. Required Signatories: ESM (Environmental Scoping Manager)       |
| <input type="checkbox"/>            | <b>Categorical Exclusion, Level 3</b> – The proposed action meets the criteria for Categorical Exclusion Manual Level 3 - table 1, CE Level Thresholds. Required Signatories: ESM, ES (Environmental Services Division) |
| <input type="checkbox"/>            | <b>Categorical Exclusion, Level 4</b> – The proposed action meets the criteria for Categorical Exclusion Manual Level 4 - table 1, CE Level Thresholds. Required Signatories: ESM, ES, FHWA                             |
| <input type="checkbox"/>            | <b>Environmental Assessment (EA)</b> – EAs require a separate FONSI. Additional research and documentation is necessary to determine the effects on the environment. Required Signatories: ES, FHWA                     |
| <input checked="" type="checkbox"/> | <b>Additional Information Addendum (AI)</b> -This is an additional information document to the FEIS/ROD document, approved on December 9, 2005.   |

Note: For documents prepared by or for Environmental Services Division, it is not necessary for the ESM of the district in which the project is located to release for public involvement or sign for approval.

**Approval** \_\_\_\_\_  
ESM Signature
Date
ES Signature
Date

\_\_\_\_\_  
 FHWA Signature Date

**Release for Public Involvement**

|              |      |             |      |                |
|--------------|------|-------------|------|----------------|
| _____        | Date | <u>REB</u>  | Date | <u>4-13-17</u> |
| ESM Initials |      | ES Initials |      |                |

**Certification of Public Involvement** \_\_\_\_\_  
Office of Public Involvement
Date

Note: Do not approve until after Section 106 public involvement and all other environmental requirements have been satisfied.

INDOT ES/District Env.  
 Reviewer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name and Organization of CE/EA Preparer: Richard Connolly, HNTB Corporation

## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

### Introduction

The Federal Highway Administration (FHWA) and Indiana Department of Transportation (INDOT), Fort Wayne District intend to proceed with an interchange modification project at the intersection of I-469 and US 24 near the town of New Haven, Allen County, Indiana (INDOT Des Number 1383675). More specifically the project is located in Sections 5, 6, 7, Township 30 North, Range 14 East in Jefferson and Milan Townships on the US Geological Survey (USGS) 7.5 Minute Maples and Fort Wayne East Topographic Quadrangle Maps. Land use in the project area (proposed right-of-way) is primarily agricultural and residential with some commercial use.

The US 24 New Haven, Indiana to Defiance, Ohio Corridor Project (Fort to Port) Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) were approved by FHWA on October 26, 2005 and December 9, 2005, respectively (Appendix B, page 2 and 117). Unless specifically discussed and addressed in this Additional Information (AI) document, all information provided in the approved FEIS/ROD remains valid.

In 2002, during the National Environmental Policy Act (NEPA) process for the Fort to Port Project INDOT recommended that the existing I-469 and US 24 interchange should be upgraded to a full and free flowing interchange. Nineteen conceptual alternatives were developed and evaluated for this interchange. The evaluation was documented in the *I-469 and US 24 Interchange: Conceptual Alternatives Summary (May 2003)*. Through a screening process and agency coordination, three feasible interchange configurations, Alternative 12, 13 and 14 were identified. Environmental analyses conducted on the three Feasible Alternatives included noise studies, ecological impacts, land use impacts, and community impacts. The evaluation of the three Feasible Alternatives was presented in a separate report entitled *I-469 and US 24 Interchange Feasible Alternatives Analysis (January 2004)*. A modified version of one of these alternatives, Alternative 13 Modified, was selected as the preferred alternative in the Fort to Port FEIS (Appendix B, page 52).

### Purpose and Need

The overall needs of the project are a result of the:

- Delay and queuing at the interchange,
- The number of crashes at the interchange,
- Satisfy the commitment made during the development of the Fort to Port FEIS/ROD to provide a free-flowing connection between I-469 and US 24.

The historical crash rate at the interchange is twice as high as the statewide average. Many of the crashes occurred at the ramp terminal intersection that is currently controlled by a traffic signal. Traffic turning west at the signalized ramp terminal approach is a critical movement due to the high traffic volume and high percentage of trucks. Though the delay at the intersection is not consistent with a failing level of service (LOS) E or F, traffic queuing onto the interstate from the



## **Indiana Department of Transportation**

County Allen Route I-469 and US 24 Des. No. 1383675

ramp approaching the traffic signal has been observed on-site and replicated with traffic simulation software. The critical movement (southbound left turn lane at the northbound ramp terminal intersection) deteriorates to LOS E during the PM Peak hour in the year 2040. The queue for the southbound approach is 2,378 feet, which would back-up onto the loop ramp, causing vehicles to queue on northbound I-469. By 2040, the peak hour LOS of this critical movement will deteriorate to a failing LOS and the queuing will be unacceptable. The desired result of the project is to achieve a LOS that is consistent with the design criteria in the Indian Design Manual. In year 2040 the intersection should be at least a LOS C.

The traffic signal at the ramp terminal intersection is the only signal on US 24 from New Haven east to the state line. All other interchanges are free flow for traffic on US 24. Creating a full and free flowing connection between US 24 and I-469 is a commitment made in the FEIS/ROD for US 24 Fort to Port Project.

The interchange modification at I-469 and US 24 is the last improvement to be completed for the Fort to Port Project.

The purpose of the I-469 and US 24 Interchange Modification Project is to:

- Improve functionality of the interchange including traffic flow and LOS,
- Increase the LOS to LOS C or better,
- Provide free flow service for all interchange directional movements,
- Enhance the regional transportation network,
- Improve overall safety of the interchange,
- Implement the commitment made in the Fort to Port FEIS/ROD to provide a full and free flowing connection between US 24 and I-469.

### **Existing Conditions**

The I-469/US 24 interchange was constructed in 1992 and is located east of Fort Wayne in Allen County. The interchange serves a portion of eastern Allen County as a point of entry into the interstate system. Approximately 40,000 vehicles per day presently use this interchange. The existing interchange has a partial cloverleaf configuration with loop ramps in the northeast and southwest quadrants. An aerial view of the existing interchange configuration can be seen in Appendix A, Figure 2.

### **Proposed Project**

INDOT has identified refinements to Alternative 13 Modified (Appendix A, Figure 4) identified as the preferred alternative in the Fort to Port FEIS dated October 26, 2005 and the ROD dated December 9, 2005, respectively (Appendix B, page 2 and 117). These refinements would meet the Purpose and Need of the project while making the alternative more cost effective. Alternatives considered during this refinement process are documented in the Engineers Report

## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

(2016) (Appendix B, page 118). The result of this effort is the development of the preferred alternative, Alternative 4a (Appendix A, Figure 5).

**Alternative 4a – Partial Cloverleaf with Flyover ramp West of Substation of over I-469 (Preferred)** - Alternative 4a would utilize the existing loop ramps in the northeast and southeast quadrants of I-469 and US 24. The US 24 westbound to I-469 southbound movement would be accommodated by crossing US 24 and I-469 with two structures. The I-469 northbound to eastbound US 24 ramp would stay west of the electric substation in the southeast quadrant of the I-469 and US 24 interchange, avoiding any effect to the substation. This alternative avoids impacts to the substation and is more cost effective than the other alternatives. As such, Alternative 4a was therefore identified as the preferred alternative.

Alternative 4a will be completed in two phases. Phase I will address removal of the signal at the northbound I-469 ramp terminus with US 24. This will include construction of the necessary ramps to eliminate the signal as well as rehabilitation of the I-469 bridge over US 24. Phase I will partly satisfy the commitment in the FEIS/ROD to make the interchange of US 24 and I-469 a free flowing interchange by removing the traffic signal and improving ramp queuing and driver expectancy. Phase I would meet the need to improve the functionality of the interchange, enhance the regional transportation network, improve the overall safety of the interchange, and provide a free flow service for the most critical directional movements between US 24 and I-469.

Phase II will eliminate the left turn for US 24 westbound traffic to I-469 southbound by including a flyover ramp to carry westbound US 24 traffic to southbound I-469 (Appendix A, Figure 5). The completion of Phase II would fully satisfy the commitment in the FEIS/ROD and further improve driver expectancy, ramp queuing, and the overall safety of the interchange. A separate AI document will be completed in the future to assess any environmental impacts from Phase II of Alternative 4a.

This AI document evaluates Phase I of Alternative 4a. The ramp alignments and right-of-way for the Alternative 13 Modified and Alternative 4a Phase I are shown in Appendix B, Figures 4 and Figure 5, respectively.

### Alternatives Considered and Dismissed

During the development of potential refinements to this interchange, four other alternatives, including Alternative 13 modified from the 2004 Engineers Report were considered and dismissed. A description of the preferred alternative along with a summary of reasons each alternative was dismissed are described below. Additional detail regarding these alternatives can be found in the *Engineers Report (2016)* included in Appendix B page 118. Criteria used to screen alternatives included full and free flowing interchange, impacts to an electric substation, and minimization of environmental impacts.

**Alternative 1-Fort to Port Flyover (Alternative 13 Modified from the 2004 Engineers Report)** - Alternative 1 was not carried forward for further study due to impacts to historic resources, impacts to the electric substation, construction costs, and long term maintenance costs. The new slip ramp in the northwest quadrant of the interchange required for this alternative



## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

would affect the view shed of the Niemeyer Farmstead which was determined eligible for listing on the National Register of Historic Places (NRHP), potentially resulting in an adverse effect on this property. The northbound I-469 to eastbound US 24 ramp would require acquisition and relocation of the electric substation in the southeast quadrant of the interchange. This relocation not considered financially feasible and should be avoided. Alternative 1 includes a 2,000-foot-long, 50-foot-high bridge which would increase the construction and long term maintenance costs of the alternative.

**Alternative 2 - Partial Cloverleaf with Flyover Ramp East of Substation** - Alternative 2 was not carried forward for further study due to impacts to the electric substation, construction costs, and long term maintenance costs. This alternative would require either the acquisition and relocation of the substation or construction of an access point and providing access to the substation in the in-field of the interchange. Isolation of the substation in the in-field of the interchange limits planned expansion of the substation. Relocating or providing access to the substation would substantially increase the cost and time needed to complete the project. This alternative would also result in the acquisition of substantially more right-of-way than other alternatives.

**Alternative 3 – Partial Cloverleaf with Trumpet Ramp East of Substation** – Alternative 3 is a modification of Alternative 2 and would have the same effects on the substation. For the same reasons as Alternative 2, Alternative 3 was not carried forward for further study.

**Alternative 4b- Partial Cloverleaf with Flyover Ramp West of Substation and under I-469** - The primary difference between Alternative 4a and Alternative 4b is the ramp for US 24 westbound to I-469 southbound would go under I-469 in Alternative 4b instead of over as in Alternative 4a. Alternative 4b would require reconstruction of 2,350 feet of I-469 and two bridges to go over the proposed ramp. The estimated construction cost of Alternative 4b is approximately \$1 million more than Alternative 4a. In addition to the construction cost, Alternative 4b would require a substantially more complex and costly Maintenance of Traffic plan than Alternative 4a.. For these reasons, Alternative 4b was not carried forward for further study.

### Funding Status and Schedule

The commitment in the FEIS/ROD to provide a full and free-flowing interchange will be addressed in phases, as full funding is not currently available. Construction of Phase I is scheduled to begin in spring 2019. The schedule for Phase II will be developed once funding is identified.

The most current project cost estimates for Alternative 4a Phase I are included in the Indiana State Transportation Improvement Program (STIP) FY 2016 to 2019 on page 26 of 897, and on pages 70, 73, 76, 77, and 86 of the Northeastern Indiana Regional Coordinating Council (NIRCC) 2016 to 2019 Transportation Improvement Program (TIP). The estimated project cost is \$9,476,000 with \$1,600,000 for right-of-way and \$8,376,000 for construction costs. The most current pages from the STIP and TIP are included in Appendix I.

## **Indiana Department of Transportation**

County Allen Route I-469 and US 24 Des. No. 1383675

### **Maintenance of Traffic (MOT)**

The MOT plan for this project will be divided into three phases.

The first construction stage will construct a new ramp for northbound I-469 to eastbound US 24. This will shift the northbound traffic onto the inner two lanes through the interchange during construction.

The second construction stage will reconstruct the three existing interchange ramps, US 24 westbound to I-469 northbound, the I-469 southbound to US 24 westbound, and the I-469 northbound to US 24 westbound. The rehabilitation of the I-469 over US 24 bridge will also begin in this phase. Traffic will remain on the two inner lanes during this phase to allow for construction of ramps.

The third construction stage will continue the bridge rehabilitation. This requires shifting both northbound and southbound traffic to the outer lanes (including ramp lanes) to complete the construction of the two inside lanes in both directions.

During construction of all three MOT phases, traffic will be shifted between I-469 northbound and southbound lanes to accommodate two lanes of traffic on I-469. Traffic will be shifted on US 24 to accommodate construction of the I-469 southbound to US 24 westbound, and the I-469 northbound to US 24 westbound ramps.

### **Public Involvement**

A series of three public hearings were held to offer the public an opportunity to comment on the DEIS for the Fort to Port Project. These hearings were held on October 26, 28 and 30, 2003. Approximately 400 people attended the three public hearings. After the public hearings INDOT and ODOT held several meetings with various affected property owners and elected officials (see Appendix H).

A Notice of Survey was sent to landowners in the project area on April 17, 2016 (see Appendix H, page 6). Public involvement to date has included meetings between the design team and local stakeholders, coordination with consulting parties during the section 106 process, and interactions between field staff and project area residents during field surveys.

Per coordination with INDOT Office of Public involvement, a public hearing will be held to present the project to community members and other interested stakeholders. This will provide the public with an in-person opportunity for them to discuss their opinions or concerns with project officials. Any comments received during the meeting or within the public comment period will be incorporated into this AI. This document will be revised after the public involvement requirements are fulfilled.



## Indiana Department of Transportation

County AllenRoute I-469 and US 24Des. No. 1383675

### Environmental Effect of Proposed Revisions

#### Right-of-Way:

The *I-469 and US 24 Interchange Modification Engineer's Report* (October 2004) estimated that 41.1 acres of additional right-of-way, not already within existing highway right-of-way, would be required for Alternative 13 Modified. This included 32.0 acres of agricultural land and 9.1 acres of residential property.

The revised interchange configuration has resulted in a change in the proposed permanent right-of-way limits for the project. Alternative 4a Phase I will require 28.84 acres of right-of-way, 19.33 of which would be from agricultural property and 9.1 acres from residential property. This right-of-way will consist of property in the northeast and southeast quadrants of the interchange. No right-of-way will be acquired in the northwest or southwest quadrants of the interchange (Appendix A, Figure 6). The right-of-way requirements for Alternative 4a Phase II will be identified as that phase of the project is developed.

**Table 1: Right-of-Way Summary**

| Land Use     | Originally Approved Right-of-Way Estimate (ac)* | Anticipated Right-of-Way (ac) | Estimated Change in Right-of-Way (ac) |
|--------------|---|-------------------------------|---------------------------------------|
| Residential  | 9.1   | 9.40                          | 0.3 acre more                         |
| Commercial   | 0   | 0                             | 0                                     |
| Agricultural | 32.0  | 19.33                         | 12.67 acres less                      |
| Industrial   | 0   | 0.11                          | 0.11 acre more                        |
| Forest       | 0   | 0                             | 0                                     |
| Wetlands     | 0   | 0                             | 0                                     |
| Other:       | 0   | 0                             | 0                                     |
| <b>Total</b> | <b>41.1</b>                                     | <b>28.84</b>                  | <b>12.26 acre less</b>                |

\* from I-469 and US 24 Interchange Modification Engineer's Report (Parsons Brinkerhoff Ohio, Inc.)

#### Relocations

An evaluation of relocations required for the I-469/US 24 interchange was documented in the *I-469 and US 24 Interchange: Conceptual Alternatives Summary* (May 2003). This evaluation documented the potential need for five relocations for the construction of the interchange. Two of these potential relocations, both at the eastern end of the interchange study area, were not realized during the development of the US 24 Fort to Port project and are not anticipated to be required for completion of Alternative 4a.

## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

The three remaining residential relocations, two in the southeast quadrant of the interchange and one in the northeast quadrant of the interchange are anticipated to be required for the construction of Alternative 4a. No additional relocations will be required for Alternative 4a.

### Wetlands

The *I-469 and US 24 Interchange Modification Engineer's Report* (October 2004) identified effects to wetlands totaling 0.3 acres for Alternative 13 Modified. The supporting wetland delineations were completed more than 5 years ago, prior to the reconstruction of US 24. A new Waters of the US report was prepared for this project to ensure that the information would reflect current conditions.

HNTB Corporation staff conducted a review of the current and historical aerial imagery, 7.5 Minute USGS Maples and Fort Wayne East, Indiana Topographic Quadrangle Map and National Wetlands Inventory (NWI) mapping for the project area identified one mapped NWI wetland at the northern edge of the investigated area. For further reference, see Figure 4 in Appendix B.

On September 11, 2015, HNTB Corporation staff performed a field survey to conduct a Waters of the US Determination and Delineation (Appendix G). This delineation was focused on the I-469/US 24 project area. Thirteen palustrine emergent (PEM) wetland features were identified during the field investigation. All the wetlands identified were associated with roadway drainage. Of these 13, ten are likely to be considered jurisdictional and three are likely to be considered isolated. For reference see the *Wetland and Waterways Delineation Report*, which was approved by INDOT Environmental Services Ecology and Water Permitting Office (INDOT-EWPO) on August 9, 2016 (Appendix G). The final determination of jurisdictional waterways will be made by the USACE.

Alternative 4a will impact approximately 2.71 acres of emergent wetlands. Each of the affected wetlands have developed within existing roadside drainage features. These wetlands currently have little wildlife habitat value but they do provide ecological benefits by taking nutrients from adjacent farm fields and retaining water and sediment. Any impacts to wetlands will be mitigated during the permitting process.

Alternative evaluated as part of the FEIS/ROD that would have had no effect on wetlands included the No-Build, Transportation System Management (TSM) Transportation Demand Management (TDM), transit, and rail freight. These alternatives would have not meet the purpose and need for the project and were not selected as the preferred alternative.

Other alternatives that met the Purpose and Need were considered and eliminated during the development of the Conceptual Alternatives Summary and the Feasible Alternatives Analysis. Wetlands within the investigated area consist of roadside drainage features, therefore any build alternative would have similar effects on wetlands.

Based upon the above considerations, it has been determined that there is no practicable alternative to the proposed new construction in wetlands and that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.



## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

Early Coordination Letters (ECLs) were sent to the United States Fish and Wildlife Service (USFWS), Indiana Department of Natural Resources Division of Fish and Wildlife (IDNR DFW), and United States Army Corps of Engineers (USACE) on February 11, 2016 (see Appendix C, page 1).

In a letter dated February 18, 2016, USFWS responded to the ECL by stating that “the proposed project will have no significant effect on wetlands or other important habitat types” and that they have no objection to the project as currently proposed. USFWS went on to state that “This precludes the need for further consultation on this project as required under Section 7, of the Endangered Species Act of 1973, as amended.” (Appendix C, page 15).

In a letter dated March 10, 2016, IDNR DFW responded to the ECL stating: “Due to the presence of wetlands on site, we recommend contacting and coordinating with the Indiana Department of Environmental Management (IDEM) 401 program and also the USACE 404 program. Impacts to wetland habitat should be mitigated at the appropriate ratio according to the 1991 INDOT/IDNR/USFWS Memorandum of Understanding.” IDNR DFW also suggested measures to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources (Appendix C, page 25-26).

In a letter dated February 17, 2016, the USACE Detroit District responded to the ECL by stating that the proposed project area may contain waterways or wetlands within the USACE jurisdiction and that authorization from the USACE will be required prior to the initiation of any work (Appendix C, page 6-12).

### Streams:

The FEIS/ROD identified effects to 15 streams totaling 18,481 linear feet of stream in Allen County. Effects to streams within the I-469/US 24 interchange area were included in the total value for Allen County but not quantified specifically for the interchange area. These stream delineations were completed more than 5 years ago, prior to the reconstruction of US 24. A new Waters of the US report was prepared for this project to ensure that the information would reflect current conditions.

On September 11, 2015 HNTB Corporation staff performed a field survey to conduct a Waters of the US Determination for the US 24 I-469 Interchange Improvement Project. Five stream features, UNT 1, UNT 2, UNT 3, UNT 4 and UNT 5 to Maumee River, were identified during the field investigation. Each of these streams would likely be classified as a Waters of the US. A total of 2,464 linear feet of stream are located within the project area. For reference see the *Wetland and Waterways Delineation Report* which was approved by INDOT-EWPO on August 9, 2016 (Appendix G). The final determination of jurisdictional waterways is made by the USACE.

No streams within the project area are listed as a Federal Wild and Scenic River or State Natural, Scenic and Recreational River, nor are they on the Indiana Register’s list of Outstanding Rivers and Streams or the National Rivers Inventory.

**Indiana Department of Transportation**

County Allen Route I-469 and US 24 Des. No. 1383675

Alternative 4a will impact approximately 1,193 linear feet of streams. Streams will be filled in and relocated to accommodate the reconfigured interchange ramps. Any impacts to streams will be mitigated during the permitting process.

ECLs were sent to the USFWS, IDNR DFW, and USACE on February 11, 2016 (Appendix C, page 1).

In a letter dated February 18, 2016, USFWS responded to the ECL by stating that "the proposed project will have no significant effect on wetlands or other important habitat types and that they have no objection to the project as currently proposed." USFWS went on to state that "This precludes the need for further consultation on this project as required under Section 7, of the Endangered Species Act of 1973, as amended." (Appendix C, page 14).

In a letter dated March 10, 2016, IDNR DFW responded to the ECL with comments to help avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources (Appendix C, page 25-26).

In a letter dated February 17, 2016, the USACE Detroit District responded to the ECL. In their letter, they stated that the proposed project area may contain waterways or wetlands within the USACE jurisdiction and that authorization from the USACE will be required prior to the initiation of any work (Appendix C, page 6-12).

In a letter dated February 22, 2016 the Allen County Surveyor response to the ECL by identifying three areas of concern (Appendix C, page 20). These three concerns include; 1) requirements that demolished homes would have to have their septic systems properly decommissioned and the flow from the houses that remain will have to be taken into account in the environmental impact study, 2) The extra surface runoff generated by the project should not be discharged through the Dahling Drain through Georgian Park to the Maumee River. The lower section of the drain as it passes through the neighborhood is already at the top end of its capacity during peak flows and has caused flooding concerns among the residents of Georgian Park, and 3) Allen County Technical Standards would require detention of these flows so as to minimize the release rate and downstream impact. The outflow of this basin would ideally be piped to the river along the I-469 right-of-way. An engineering study would provide the sizing of the pipe required to handle the peak flow from this interchange and the watershed that drains into the interchange area. These concerns will be documented into the project's environmental commitments and incorporated into the project's design as required.

### **Terrestrial Habitat**

In November 2002, field studies were conducted to identify ecological resources within the study area. Ecological Resources identified within the I-469 and US 24 interchange are included in Appendix A, Figure 7).

The Alternative 4a Phase I right-of-way footprint will impact the same terrestrial habitat types documented in the FEIS/ROD. Habitat types within the project area include upland forest, wetland forest, residential lawns, successional fields, and agricultural fields. Alternative 4a



## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

Phase II would convert approximately 13.91 acres of agricultural field, 8.6 acres of residential lawns, and 6.22 acres of successional field habitat to INDOT right-of-way.

ECLs were sent to the USFWS and IDNR DFW on February 11, 2016 (Appendix C, page 1).

In a letter dated February 18, 2016, USFWS responded to the ECL by stating that "that the proposed project will have no significant effect on wetlands or other important habitat types."

In a letter dated March 10, 2016, IDNR DFW responded to the ECL with two suggested measures to avoid, minimize, or compensate for impacts to botanical resources. The first suggested measures included revegetating all bare and disturbed areas with a mixture of grasses (excluding all varieties of tall fescue), legumes, and native shrub and hardwood tree species as soon as possible upon project completion. The second measure is to seed and protect all disturbed streambanks and slopes that are 3:1 or steeper with erosion control blankets, seed and apply mulch on all other disturbed areas.

### Endangered Species

Since the approval of the FEIS/ROD, the northern long eared bat (NLEB) has been listed as a federally threatened species.

The Allen County listing of endangered, threatened, or rare (ETR) species and high quality natural communities was reviewed from the IDNR Heritage Data Center ([http://www.in.gov/dnr/naturepreserve/files/np\\_wayne.pdf](http://www.in.gov/dnr/naturepreserve/files/np_wayne.pdf)).

This list indicates multiple state and federally listed species have been noted within Allen County. For reference to the entire list see the Red Flag Summary (Appendix E, pages 11-12). None of these species were observed during the field survey.

Additionally, the threatened and endangered species noted in Allen County in the USFWS list (<http://www.fws.gov/midwest/endangered/lists/indiana-cty.html>) were reviewed. This list indicates two federally endangered species, the Indiana bat (*Myotis sodalis*), and the rayed bean mussel (*Villosa fabalis*), and one federally threatened species, the NLEB (*Myotis septentrionalis*), in Allen County. Suitable habitat for the Indiana bat and NLEB was observed during the field survey on September 11, 2015 at the northern edge of the project area within the riparian area of the Maumee River. This habitat is not anticipated to be affected by Alternative 4a.

The FEIS identified potential eastern massasauga rattlesnake (*Sistrurus c. catenatus*) habitat in the northwestern quadrant on the interchange, within the study area for the FEIS. This potential habitat is outside of the area anticipated to be affected by Alternative 4a and therefore will not be affected by this project. During recoordination efforts with the USFWS and IDNR DFW no mention of the eastern massasauga was made.

ECLs were sent to the USFWS, IDNR DFW, and USACE on February 11, 2016 (Appendix C, page 1-5).

## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

In a letter dated February 18, 2016, USFWS responded to the ECL by stating that "the proposed project will have no significant effect on wetlands or other important habitat types" and that they have no objection to the project as currently proposed. USFWS went on to state that "This precludes the need for further consultation on this project as required under Section 7, of the Endangered Species Act of 1973, as amended." (Appendix C, page 14).

The IDNR DFW provided no new comments regarding threatened or endangered species in their re-coordination response letter, dated March 10, 2016 (Appendix C, pages 25-26).

### Farmland

During the preparation of the FEIS/ROD a Farmland Conversion Impact Rating (FCIR) form (AD-1006) was generated for Alternative 13 Modified. This FCIR analysis was completed separately from the rest of the project. The interchange configuration approved in the FEIS/ROD, Alternative 13 Modified had a FCIR point value of 187.

The US Department of Agriculture Natural Resources Conservation Service (USDA-NRCS) was sent an ECL on February 11, 2016 (Appendix C, page 1-5). The USDA-NRCS, in a letter dated February 24, 2016, stated that this project will cause a conversion of prime farmland (Appendix C, page 17). The FCIR form (AD-1006) was completed and the total point value for Alternative 4a was 195.

Since the point value for Alternative 4a, was greater than 160 (195 total), additional coordination was initiated. On December 8, 2016, the USDA-NRCS responded to this coordination with a letter stating that the USDA NRCS has determined that no further action is required for the proposed revisions to the US 24/I-469 Interchange project (Appendix C, page 18).

No other alternatives other than those already discussed in this document will be considered without a re-evaluation of the project's potential impacts upon farmland. This project will not have a significant impact on farmland.

### Cultural Resources

The Section 106 process completed as part of the Fort to Port Project resulted in a finding of "No Historic Properties Affected" for the Niemeyer farm under the Preferred Alternative. This finding, contained within the Programmatic Agreement (PA) for the Fort to Port Project expired in October of 2015. Through coordination with INDOT Cultural Resources Office (CRO) it was determined that the expiration of the PA necessitated re-initiation of the Section 106 process.

#### Area of Potential Effect (APE):

The APE is "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." [36 CFR § 800.16(d)]



## **Indiana Department of Transportation**

County Allen Route I-469 and US 24 Des. No. 1383675

Pursuant to 36 CFR 800.16(d), the APE was drawn to encompass potential impacts, per guidance in the INDOT Cultural Resources Manual (2014). Historians drew the APE as an approximately 0.25-mile (1,320-foot) buffer from the proposed project location and narrowed the APE in areas where properties had no view of the project location or where topography would shield the effects from this project. Detour routes did not factor into the drawing of the APE as both I-469 and US 24 will remain open during construction. The State Historic Preservation Officer (SHPO) concurred with the APE in correspondence dated March 18, 2016 (Appendix D, page 39). The APE for archaeological resources was defined as the project footprint (project area) (Appendix D, page 4).

### Coordination with Consulting Parties:

Invitations to become Consulting Parties were sent on February 23, 2016. The SHPO, FHWA and INDOT are mandatory consulting parties. The following parties were invited:

- ARCH, Inc.
- African/African-American Historical Museum (Fort Wayne)
- The History Center (Allen County Historical Society)
- Besancon Historical Society
- New Haven Area Heritage Association
- Fort Wayne Historic Preservation Commission
- Canal Society of Indiana
- Indiana Landmarks – Northern Regional Office;
- Northeastern Indiana Regional Coordinating Council
- Pete Limkemann
- Roger and Donnalynn Melceher (owners of the Niemeyer Farmstead)
- Diane Hunter, Assistant Tribal Historic Preservation Officer (THPO) for the Miami Tribe of Oklahoma
- Allen County Historian
- Allen County Genealogical Society of Indiana

These potential consulting parties were asked to respond within thirty (30) days. Weintraut and Associates (W&A) received affirmative responses and/or comments from the following, all of whom were considered consulting parties:

- Roger and Donnalynn Melceher (Appendix D, page 54)
- Allen County Historian (Appendix D, page 26)
- ARCH, Inc. (Appendix D, page 43)
- Diane Hunter, Assistant THPO for the Miami Tribe of Oklahoma (Appendix D, page 12)
- IDNR SHPO (Appendix D, page 24, 37, 39, 57, and 79)

On March 22, 2016, ARCH, Inc. responded to the ECL noting that they agreed with the HPR regarding the eligibility of the Niemeyer Farm and 724 South Doyle Road, and “that no other building in the APE achieves that level of significance.” ARCH, Inc. also expressed concern about the project’s potential impact on historic properties especially the Niemeyer Farm and that

## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

they looked forward to seeing additional information describing the impacts of the proposed project (Appendix D, page 43).

On September 1, 2016, Niemeyer Farmstead property owners Roger and Donnalynn Melcher, two representatives from ARCH, Inc. and a representative of the Miami Tribe of Oklahoma attended the Consulting Party meeting held at the INDOT – Fort Wayne District Office. An overview of Section 106 efforts was provided, including the results of the HPR and the archaeology report (Appendix D, page 54).

The owners of the Niemeyer Farmstead, Roger and Donnalynn Melcher, asked whether the current project would impact his property. Representatives for HNTB noted there would be minimal construction west of I-469 and the current right-of-way around the property would remain as is; no property would be acquired from the Farmstead (Appendix D, page 54).

After the meeting, the Miami representative commented on the cultural significance of the Wabash & Erie Canal to the Miami people since the Canal was the path of Miami removal from Indiana to Kansas (Appendix D, page 12).

At that same meeting, a representative of IDNR, SHPO asked for clarification regarding the distances of cemeteries on Edgerton Road from the project area. Following the meeting, it was confirmed the nearest cemetery was approximately 750 feet from the edge of the project area (Appendix D, page 54).

Subsequent to the Consulting Parties meeting, the project's 800.11 documentation of "No Adverse Effect" was published in the *Journal Gazette* on November 3, 2016. The SHPO concurred with this finding on November 22, 2016. No other comments were received.

A summary of correspondence between the project team and the consulting parties is included in Appendix D, page 11.

### Archaeology:

A Section 106 study including an archaeological survey was conducted in advance of the ROD for the Fort to Port project. On October 6, 2004, SHPO concurred that the project would have No Adverse Effect. However, that same letter said that Site 12AL1674 (the Gronauer Lock) "must be completely avoided or subject to additional archaeological investigation." Portions of two archaeological sites—Site 12AL1674 (the Gronauer Lock) and Site 12AL2081 (the Van Horn site)—were found to lie within, or adjacent to, the project area.

On October 1, 2015, Weintraut & Associates, Inc. initiated archaeological identification and evaluation by conducting a records check on SHAARD and reviewing files at the IDNR, DHPA. W&A conducted an archaeological field reconnaissance on October 13, 14, 15 and 16, 2015, and December 15, 2015.

Archaeologists for W&A conducted additional research to discern if there existed any areas within the proposed project limits had not been surveyed by a professional archaeologist based



## Indiana Department of Transportation

County Allen

Route I-469 and US 24

Des. No. 1383675

upon the 2004 FEIS survey area. Because of this research, two areas within the current project limits were found not to have been previously surveyed. W&A conducted an additional archaeological field reconnaissance of these parcels on May 4 and 25, 2016, and on June 6, 2016.

In July 2016, W&A completed the *Archaeological Records Check and Phase Ia Reconnaissance Report*. Three sites (12AL2265, 12AL2266, and 12AL2268) were identified but none were recommended as eligible for listing in the NRHP. The report noted that current survey did not reevaluate the remaining portion of the Gronauer Lock, which remains in situ under the current US 24 alignment. This lock remnant had been previously determined eligible for listing in the NRHP under Criterion D. Furthermore, the report noted that site 12AL2081 (Van Horn site) is located adjacent to the northwest portion of the project area. The report recommended that all construction activities should be confined within the established INDOT ROW to avoid impacts to this site since it had been previously recommended as potentially eligible to the NRHP. The archaeologists recommended no additional work prior to beginning construction and that the project proceed as planned.

On July 29, 2016, the *Archaeological Records Check and Phase Ia Reconnaissance Report*, which was approved by INDOT, was submitted to SHPO. On August 3, 2016, the report was sent to the THPO for the Miami Tribe of Oklahoma. No response was received from the THPO of the Miami Tribe of Oklahoma regarding the Archaeological Report.

On August 31 2016, the staff of the SHPO sent a letter responding to the submitted *Archaeological Records Check and Phase Ia Reconnaissance Report*. After reviewing the report and all available documentation, the staff of the SHPO concurred with the opinions stated in the archaeology report regarding the non-eligible sites and destroyed sites. SHPO cautioned that sites 12AL2264 (Gronauer Lock) and 12AL2081 (Van Horn site) must be avoided by all ground disturbing project activities or a plan for "subsurface archaeological investigations must be submitted to the Division of Historic Preservation and Archaeology for review and comment." SHPO also requested that archaeological survey information regarding site 12AL2267 be submitted to the Indiana DHPA SHAARD system database. Finally, SHPO stated that "if any prehistoric or historic archaeological artifacts or human remains are uncovered...state law...requires that the discovery must be reported to the Department of Natural Resources within two (2) business days." (Appendix D, page 57).

### Historic Properties:

Pursuant to 36 CFR § 800.4(b), W&A initiated aboveground identification and evaluation of aboveground resources by conducting a review of the NRHP, National Historic Landmarks (NHL) Program, Indiana Register of Historic Sites and Structures (State Register), Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER, State Historic Architectural and Archaeological Research Database (SHAARD), Indiana Historic Sites and Structures Inventory (IHSSI) survey cards at the IDNR Division of Historic Preservation and Archaeology (DHPA), and the *Indiana Historic Bridge Inventory* for previously identified properties. Historians examined other primary and secondary resources. Documentary research for the project included state and local histories and maps as well as online resources.

## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

W&A staff conducted the aboveground survey of the APE on October 12, 2015. They viewed all properties in the APE and photographed and recorded survey notes about properties in and around the APE that will be fifty years of age at the time of the project's letting.

In January 2016, historians completed a Historic Property Report (HPR), which contained a historic context and identified one property as previously determined eligible for the NRHP: Niemeyer Farmstead (IHSSI No.: 003-382-09003). The HPR recommended one property eligible for listing in the NRHP: Ranch-style House (WA 1) located at 725 South Doyle Road (Appendix D, page 66).

**Niemeyer Farmstead (IHSSI No.: 003-382-09003):** This farmstead, which dates from around 1880, encompasses a Queen-Anne-style dwelling, two barns, a shed, a wind mill, and a garage. The Niemeyer Farmstead (IHSSI No.: 003-382-09003) was previously determined eligible under Criterion C in the area of architecture. Historians also recommend it as eligible under Criterion A as an outstanding example of a later nineteenth century farmstead. It is significant as the embodiment of a late 19th century farmstead and as an outstanding example of Queen-Anne architecture. The period of significance is 1880.

**Ranch-style House (WA 1):** This early Ranch-style House, built around 1945, is an L-shaped dwelling with a cross hipped roof and stone veneer exterior. The house features numerous original details. The Ranch-Style house (WA 1) is recommended as eligible for listing in the NRHP under Criterion C for architecture. The period of significance is circa 1945.

On March 18, 2016, SHPO responded to the HPR. The SHPO agreed that the APE was appropriate for the project and concurred with the findings of the HPR regarding the Niemeyer Farmstead and Ranch-style House at 724 South Doyle Road, noting that the staff agreed that these were the only two above-ground properties in the APE that were NRHP-eligible.

### Documentation, Findings:

An 800.11(e) document was signed by INDOT, on behalf of FHWA, on October 27, 2016, which issued a "No Adverse Effect" finding for the project. The 800.11(e) was then sent to consulting parties, including the SHPO, on October 28, 2016. SHPO's concurrence with the "No Adverse Effect" finding was received on November 22, 2016 (Appendix D, page 79). No response was received from consulting parties.

### Public Involvement:

In accordance with 36 CFR 800.2(d), 800.3(e), and 800.6(a)(4), an advertisement was placed in *The Journal Gazette* on November 3, 2016 to solicit comments on the "Historic Properties Affected: No Adverse Effect" finding. No comments were received by the established deadline of December 3, 2016 and as such, the Section 106 process was concluded. A copy of the legal notice and publishers claim are provided in Appendix D, page 81.



## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

The Section 106 process has been completed and the responsibilities of the FHWA under Section 106 have been fulfilled.

### Section 6(f) Resources:

Section 6(f) properties are lands purchased or improved using money from the Land and Water Conservation Fund. There are no Section 6(f) resources within or surrounding the proposed project area. No section 6(f) resources were identified in the National Park Service's Land and Water Conservation fund website (<http://www.nps.gov/ncrc/programs/lwcf/history.html>).

An ECL was sent to the IDNR DFW on February 11, 2016 (see Appendix C, page 1).

On March 10, 2016 IDNR DFW responded to the ECL by stating that the New Haven-Adams Township Parks and Recreation's New Havel Park and Havenhurst Park are Land and Water Conservation Funded sites within ½ mile southwest and west of the project area respectively. (Appendix C, page 25-26).

The New Haven-Adams Township Parks and Recreation's New Havel Park and Havenhurst Park are both outside of the project area and will not be affected by the project.

### Noise

Noise analyses were completed on Alternative 13 Modified as documented in the FEIS/ROD and *I-469 and US 24 Interchange Feasible Alternatives Analysis* (January 2004). Residential land uses in the project area were represented by four separate receivers, numbered 51-54 in the FEIS/ROD. No noise abatement measures were recommended in the US-24/I-469 project area during the FEIS/ROD.

Revisions to the interchange ramp horizontal and vertical alignments warranted the preparation of a new noise analysis. In July 2016 HNTB Corporation prepared a Traffic Noise Analysis for the project (Appendix F).

Existing noise level measurements were conducted on March 25, 2016, at four representative sites in the project corridor. A 20-minute measurement was taken at each site. The measurements were made in accordance with FHWA and INDOT guidelines. Traffic counts were taken concurrently with the noise measurements.

The latest version of the FHWA Traffic Noise Model, TNM@2.5, was used to model existing (2016) and design year (2040) worst hourly traffic noise levels within the I-469 and US 24 Interchange noise study area. A total of 15 representative noise receptors representing 15 receivers, numbered N1 through N15, as shown in the Traffic Noise Analysis Report (Appendix F), were modeled. These receptors were selected to model representative noise impacts at areas consisting of residential uses.

Existing peak hour (2016) residential noise levels range from 57.6 to 67.7 dBA Leq(h). Predicted future design year (2040) noise levels adjacent to the proposed project would approach or exceed

## **Indiana Department of Transportation**

County Allen Route I-469 and US 24 Des. No. 1383675

the Noise Abatement Criteria (NAC) at four receiver locations representing four receptors consisting of four residences. The noise levels at these four receptors would range from 66.4 to 71.3 dBA Leq(h).

Three noise barrier locations were modeled in the noise study area. Barrier designs at each location were feasible but none were reasonable. The barrier designs ranged from 1,198 to 3,032 feet in length, and 4 to 20 feet high. They ranged in cost from \$419,118 to \$1,819,224. The cost per benefited receptor for the analyzed barriers ranged from \$209,559 to \$1,819,224. Noise abatement has been found to be feasible, but not reasonable as the cost exceeded the cost threshold of \$30,000 per benefited receptor established by the INDOT Traffic Noise policy.

This Traffic Noise Analysis was approved by INDOT ES on July 19, 2016.

Based on these studies, the State of Indiana has not identified any locations where noise abatement is likely. A reevaluation of the noise analysis will occur during final design. If during final design it is determined that conditions have changed such that noise abatement is feasible and reasonable, the abatement measures might be provided. The final decision on the installation of any abatement measure(s) will be made upon the completion of the project's final design and the public involvement processes.

### **Hazardous Materials**

Discussion of hazardous materials site in the FEIS/ROD was limited to providing the results of Phase II Environmental Site Assessments (ESAs) conducted during the FEIS studies. A Phase II ESA was conducted on three sites along the project corridor. None of these sites are within this project's study area.

A Red Flag Investigation (RFI) was completed on July 18, 2016 by HNTB (Appendix E). One industrial Waste Site, two Leaking Underground Storage Tanks (LUSTs), one NPDES Facility, one Solid Waste Landfill, and one Underground Storage Tank (UST) were located within a half-mile radius of the project area but outside of the project area. Therefore, no items of HAZMAT concern will be impacted by the project.

On February 29, 2016 the City of New Haven Engineering Department responded to early coordination with information about sites identified on the RFI. A summary of their input is as follows:

- 1) The New Haven Maintenance Center located on Summit Street has a small detention facility that is not identified on the exhibit. It would be appropriate to identify the facility as a water resource.

Response: This detention facility outside of the project area and will not be impacted by the project. This feature is visible on Figure 2 in Appendix A.



## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

- 2) The New Haven Maintenance Center is identified as a "Solid Waste Landfill" on the RFI mapping. The City of New Haven operates an IDEM permitted "Solid Waste Composting Facility" within the Maintenance Center.

Response: Solid Waste Composting facilities are identified as "Solid Waste Landfills" on the RFI mapping. This project will not affect the New Haven Maintenance Center.

- 3) Hollman Legal Drain crosses under the Southeast corner of the New Haven Maintenance Center site before crossing under I-469. It may be appropriate to contact the Allen County Surveyors office for the exact location of the legal drain throughout the remainder of the project area.

Response: The exact location of this legal drain will be identified via coordination with the Allen County Surveyors Office as the project progresses. If needed a legal drain permit will be obtained.

- 4) The City of New Haven has recently annexed property southeast of the project area.

Response: This annex area is outside of the project area. The project will not impact this area.

- 5) The Allen County Regional Sewer and Water District owns and maintains a sewage force main within the project area that serves the Georgian Park Subdivision.

Response: Utility coordination will be conducted and any conflict will be identified.

- 6) The City of New Haven has coordinated with INDOT on the installation of pipe casing for the future expansion of potable water and sewage utilities.

Response: Utility coordination will be conducted and any conflict will be identified.

### Agency Coordination

Coordination with the resource agencies was reinitiated due to modifications in the scope of work and right-of-way limits. Early coordination letters were sent to agencies on February 11, 2016 (Appendix C, page 1-4). If no response was received, it was assumed the agency did not expect that the project will result in substantial impacts. The agencies/individuals listed in the table below were contacted during early coordination.

**Table2. Agency Coordination**

| Agency   | Date of Response  | Appendix C Reference |
|--|-------------------|----------------------|
| IDEM, Ground Water Section                         | February 17, 2016 | Page 5               |
| USACE Detroit District, Regulatory Project Manager | February 17, 2016 | Page 6 - 9           |

# Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

| Agency  | Date of Response                       | Appendix C Reference |
|---|--|----------------------|
| USACE, Environmental Analysis Branch                  | March 29, 2016                         | Page 10-13           |
| INDOT, Department of Aviation                         | February 18, 2016                      | Page 13              |
| USFWS, Bloomington Field Office                       | February 18, 2016                      | Page 14              |
| Northeastern Indiana Regional Coordinating Council    | February 23, 2016                      | Page 15              |
| Natural Resources Conservation Service (NRCS)         | February 24, 2016,<br>December 8, 2016 | Page 16-19           |
| Allen County Surveyors Office                         | February 22, 2016                      | Page 20              |
| INDOT, Office of Public Involvement                   | February 26, 2016                      | Page 21              |
| City of New Haven, Engineering Department             | February 29, 2016                      | Page 22-24           |
| IDNR, Division of Fish and Wildlife                   | March 10, 2016                         | Page 25              |
| Indiana Geological Survey                             | April 7, 2016.                         | Page 27              |
| IDEM Autoresponse                                     | December 7, 2016                       | Pages 28-34          |
| Allen County Assessor                                 | No Response                            | N/A                  |
| Allen County Commissioner                             | No Response                            | N/A                  |
| Director of Homeland Security, Allen County           | No Response                            | N/A                  |
| Highway Director, Allen County                        | No Response                            | N/A                  |
| Sheriff, Allen County                                 | No Response                            | N/A                  |
| Allen County Department of Planning Services          | No Response                            | N/A                  |
| City Clerk/Treasurer, City of New Haven               | No Response                            | N/A                  |
| Mayor, City of New Haven                              | No Response                            | N/A                  |
| City of New Haven Fire Department                     | No Response                            | N/A                  |
| City of New Haven Police Department                   | No Response                            | N/A                  |
| Paramedic, City of New Haven                          | No Response                            | N/A                  |
| New Haven Planning and Development                    | No Response                            | N/A                  |
| City of Fort Wayne, Mayor                             | No Response                            | N/A                  |
| Jefferson Township, Trustee                           | No Response                            | N/A                  |
| Principal, New Haven High School                      | No Response                            | N/A                  |
| Director of Transportation, East Allen County Schools | No Response                            | N/A                  |
| US Environmental Protection Agency, Region 5 Office   | No Response                            | N/A                  |



## Indiana Department of Transportation

County Allen Route I-469 and US 24 Des. No. 1383675

| Agency  | Date of Response | Appendix C Reference |
|---|------------------|----------------------|
| US Department of Housing and Urban Development, Chicago Regional Office | No Response      | N/A                  |
| Midwest Region Director, National Parks Service                         | No Response      | N/A                  |

### Commitments

The commitments listed below were provided through re-coordination with resource agencies during the development of this AI document. These commitments only include those not documented in the FEIS/ROD. Commitments made during the FEIS/ROD remain valid.

#### Firm:

1. Of the four houses immediately inside the project area, only the one at 11432 Harper Road has a septic system on record. That leaves three houses with unrecorded systems that could be either be old filter beds or straight pipes from the septic tank to the nearest field tile. There are three houses south of the project on Edgerton Road that may or may not drain into the Linden Drain flowing into the project area from the south. The homes that would be demolished would have to have their septic tanks properly decommissioned and the flow from these houses that remain will have to be taken into account in any environmental impact study. (Allen County Surveyor)
2. The extra surface runoff generated by the project should not be discharged through the Dahling Drain through Georgian Park to the Maumee River. The lower section of the drain as it passes through the neighborhood is already at the top end of its capacity during peak flows and has caused flooding concerns among the residents of Georgian Park. (Allen County Surveyor)
3. Allen County Technical Standards would require detention of these flows so as to minimize the release rate and downstream impact. The outflow of this basin would ideally be piped to the river along the I-469 right-of-way. An engineering study would provide the sizing of the pipe required to handle the peak flow from this interchange and the watershed that drains into the interchange area. (Allen County Surveyor)
4. Grounaeur Lock and the Van Horn site shall be labeled on project construction maps. (INDOT CRO and IDNR SHPO)

### Conclusion

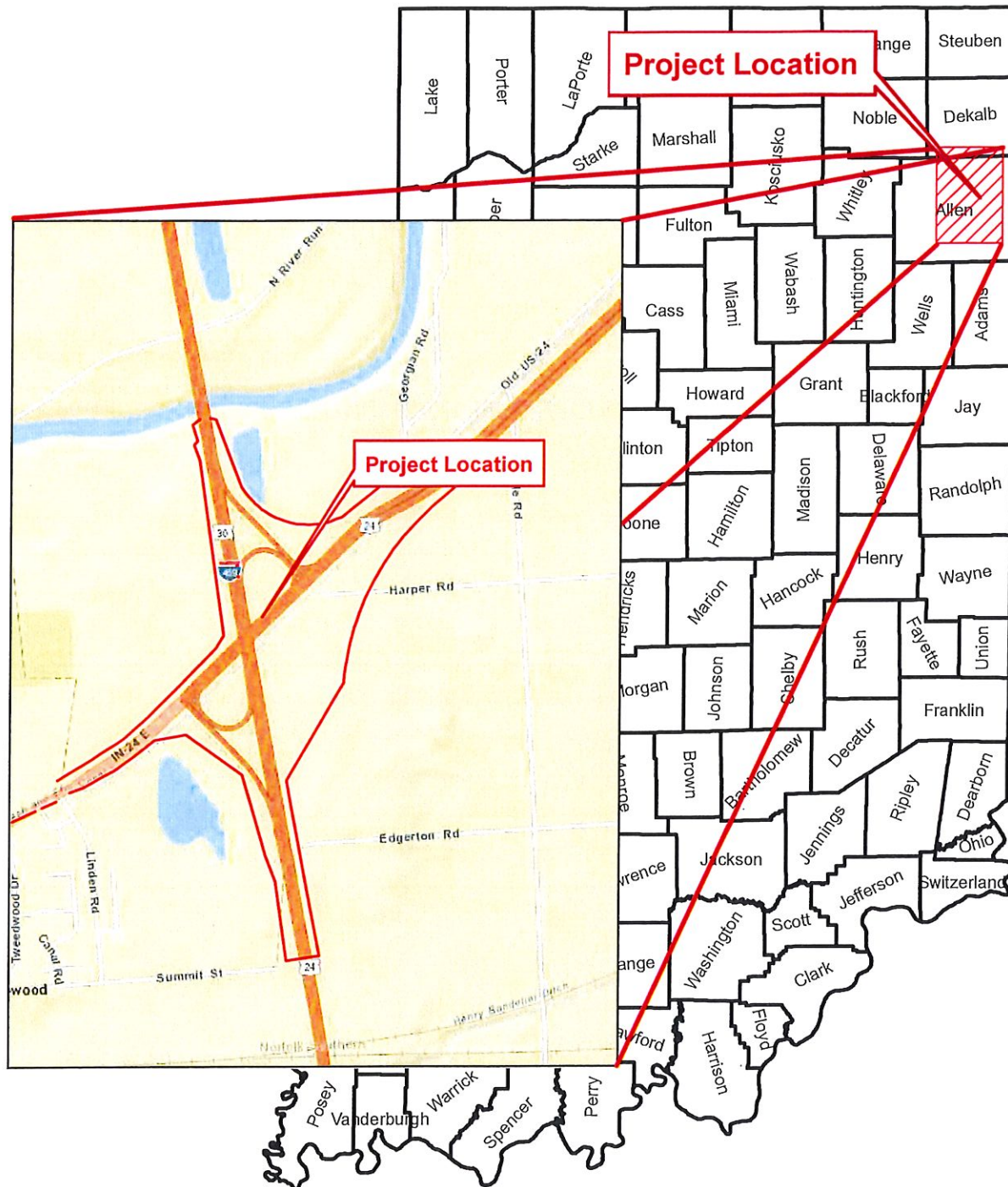
This AI was prepared to address modification made to the scope of the project. There are no additional impacts to environmental features, other than those outlined in this document. Unless

***Indiana Department of Transportation***

County Allen Route I-469 and US 24 Des. No. 1383675

specifically discussed and addressed in this AI, all information provided and statements made in the FEIS/ROD remain valid.





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## Legend

 Project Area

0 15 30 60  
Miles

## Figure 1: Project Location

I-469 and U.S. 24 Interchange Modification  
Allen County, Indiana

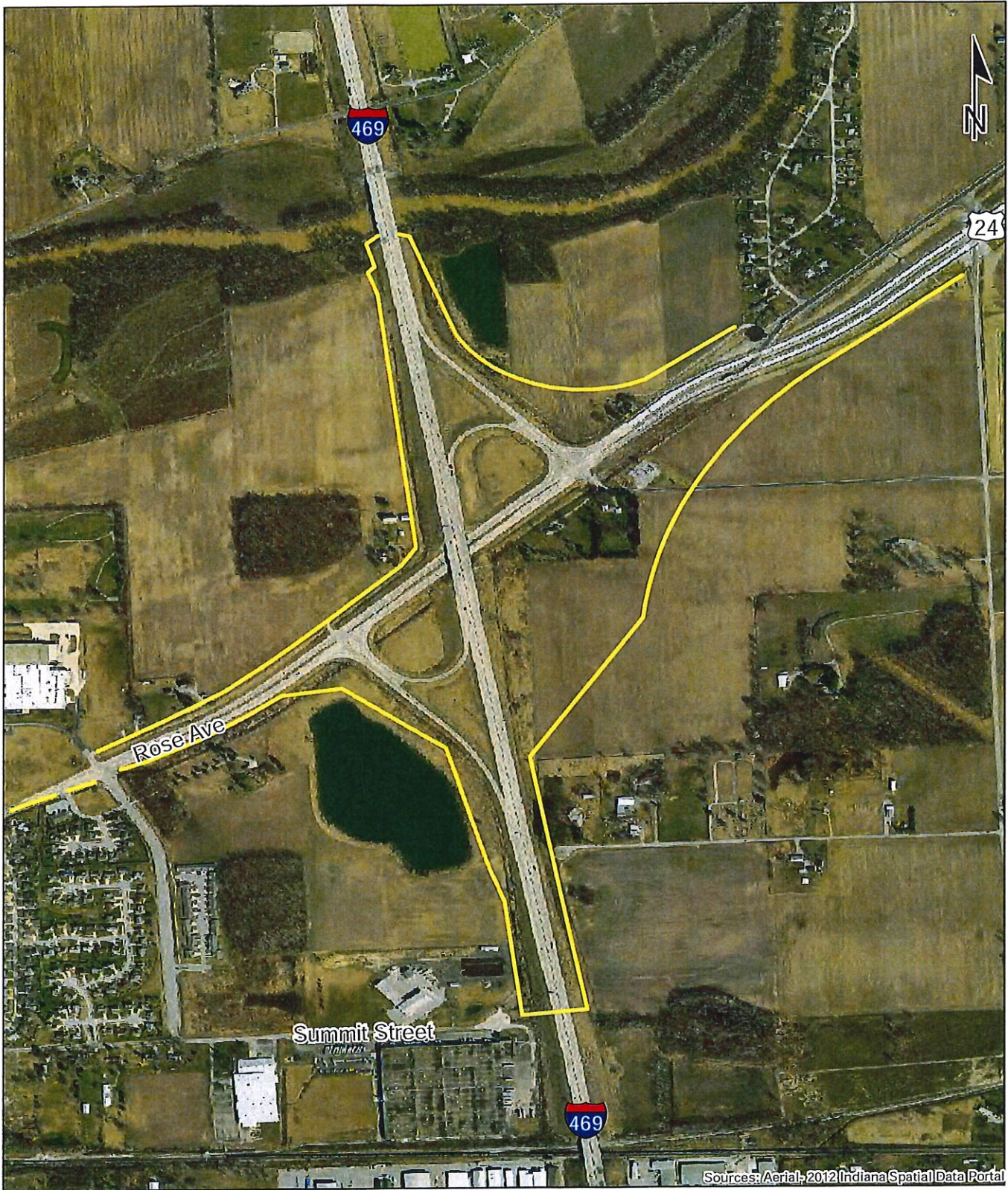
Des. No. 1383675

1 inch = 250,000 feet

**HNTB**

Graphics created by HNTB Corporation (2015)





## Legend

— Project Area

0 500 1,000  
Feet

## Figure 2: Project Aerial

I-469 and U.S. 24 Interchange Modification  
Allen County, Indiana

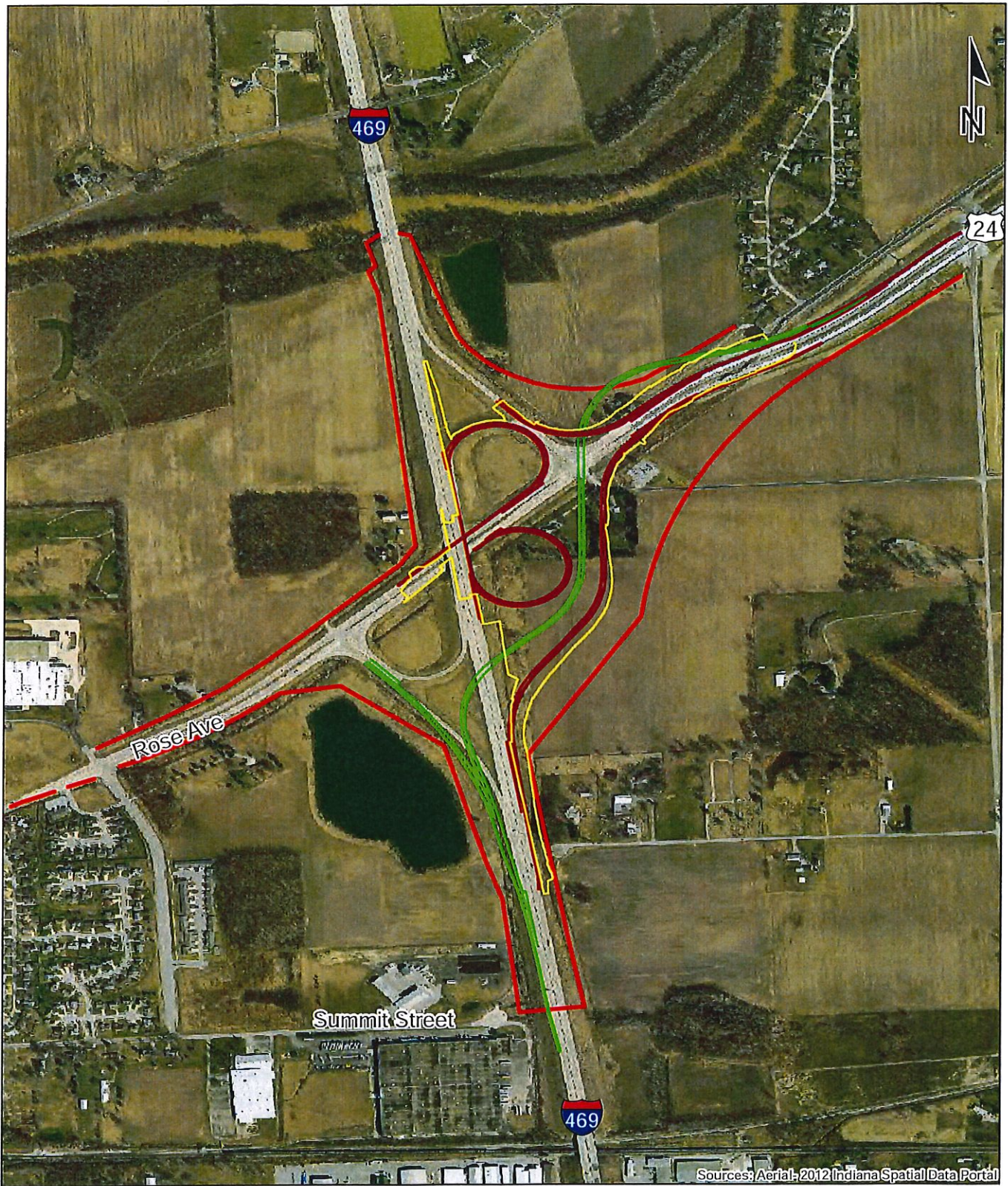
Des. No. 1383675

1 inch = 1,000 feet

**HNTB**

Graphics created by HNTB Corporation (2015)





#### Legend

- Alternative 4a Phase I Construction Limits
- Alternative 4a Phase I
- Alternative 4a Phase II
- FEIS Study Area

0 500 1,000  
Feet

Figure 5: Alternative 4a Phase I and II  
I-469 and U.S. 24 Interchange Modification  
Allen County, Indiana

Des. No. 1383675

1 inch = 1,000 feet

**HNTB**

Graphics created by HNTB Corporation (2015)